

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

INTERFOCUS INC., a California Corporation,

Plaintiff,

v.

HANGZHOU HIBABY TECHNOLOGY CO.,
LTD. and HIBOBI TECHNOLOGY LIMITED,

Defendants.

Case No.: 1:22-cv-02259

Honorable Steven C. Seeger

**DECLARATION OF ZIYONG LI IN SUPPORT OF DEFENDANTS'
PARTIAL MOTION TO DISMISS UNDER RULE 12(b)(6)**

I, Ziyong Li, declare and state as follows:

1. This declaration is based upon my personal knowledge of the facts stated herein or on the business records that were made at the time or in the regular course of business. If called as a witness, I could and would testify to the statements made herein.

2. I am an attorney at Benesch Friedlander Coplan & Aronoff LLP.

3. I reviewed the Complaint, its exhibits, and Plaintiff witness Robert Rosenblum's declaration and the exhibits. Below is a true and accurate summary of the number of images identified in Exhibit 2 of the Complaint.

26 Registrations in Exhibit 2 of the Complaint	Rosenblum Declaration	Number of Pictures
VA0002259775	Exhibit 9A	750
VA0002261342	Exhibit 17A	750
VA0002262261	Exhibit 18A	750
VA0002262268	Exhibit 15A	750
VA0002266425	Exhibit 10A	750
VA0002266527	Exhibit 33A; Exhibit 41A (same)	750
VA0002266770	Exhibit 14A	750
VA0002266891	Exhibit 2A	750
VA0002267269	Exhibit 20A	750
VA0002267274	Exhibit 22A	750
VA0002267295	Exhibit 37A	750
VA0002267346	Exhibit 13A	750
VA0002273862	Exhibit 24A	750
VA0002276650	Exhibit 30A	750
VA0002282229	Exhibit 44A; Exhibit 4A (same); Exhibit 8A (same)	29
VA0002282656	Exhibit 1A	750
VA0002282931	Exhibit 5A	6
VA0002283150	Exhibit 29A	750
VA0002283332	Exhibit 12A	13
VA0002287366	Exhibit 28A	750
VA0002287498	Exhibit 32A	750

26 Registrations in Exhibit 2 of the Complaint	Rosenblum Declaration	Number of Pictures
VA0002289507	Exhibit 11A; Exhibit 35A (same); Exhibit 36A (same); Exhibit 43A (same),	43
VA0002289508	Exhibit 16A; Exhibit 19A (same); Exhibit 21A (same); Exhibit 23A (same); Exhibit 25A (same); Exhibit 26A (same); Exhibit 27A (same); Exhibit 31A (same); Exhibit 34A (same); Exhibit 42A (same)	72
VAu001404114	Exhibit 7A	750
VAu001404200	Exhibit 39A	750
VAu001420322	Exhibit 3A	750
Total		15,913

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 28, 2022, in San Francisco, California.

/s/ Ziyong Li

Ziyong Li